

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA, :
:
Plaintiff, :
: 19 Civ. 9578 (JPC)
-v- :
:
WILLIAM DOONAN and WILLIAM DOONAN AND :
ASSOCIATES, INC., *doing business as* WILLIAM :
DOONAN, ESQ., :
:
Defendants. :
:
-----X

JOHN P. CRONAN, United States District Judge:

The Court received the attached letters on January 25, 2022. In the letters, Defendant William Doonan indicates that he wishes to explore settlement of this case. Plaintiff shall file a letter by January 28, 2022 addressing whether in its view a referral to the Honorable Katharine H. Parker for a settlement conference may be productive.

SO ORDERED.

Dated: January 26, 2022
New York, New York



JOHN P. CRONAN
United States District Judge

January 9th, 2022

William Doonan
104 Outlook Ave
Bronx, NY 10465

Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2725
Email: charles.jacob@usdoj.gov

Dear Charles Jacob:

According to the Federal Rules of Civil Procedure, you and I have to do everything possible to settle this case before going to trial. Please ask yourself, "What have I done to try to settle this case?" I'm sure you come to the answer that you have done practically nothing to settle this case. Charles Jacob, Assistant District Attorney for the Southern District Of New York, please look yourself in the mirror and ask yourself, "Is this why I went to law school?" You started this case on or about August 15th, 2018 which is approximately 3 and a half years ago, with the notion that the defendant in this case pled guilty to two felonies. As a matter of fact you emphasized to me on a number of occasions that, "I wouldn't have a Snowball's chance in hell in winning this case because the defendant in this case pled guilty to two felonies". I was shocked when you first told me this. You reiterated that all you would need is proof that the defendant in this case pled guilty to two felonies to convince a federal judge to punish the defendant even more then the trial judge specified.

So I told you, YOU ARE WRONG! Therefore, we disagree and I'll see you in court. We met for the first time on or about February 1st, 2019 when you requested Federal Judge Anita Torres to grant you a preliminary injunction. We met Judge Anita Torres and her aide in the courtroom where I offered a settlement that I thought was fair and if my memory serves me correctly, Judge Anita Torres, also thought it was fair. You asked the Judge permission to be able to call your supervisor. She granted permission and you left the courtroom. I had a talk with Judge Anita Torres and the young man she was training while you were away. The Judge and I discussed the camp at Fort Dix among other things. I told her it was a great place to be incarcerated if you had to be incarcerated. I told her that I practiced ballroom dancing when I was there, usually 2-3 hours a day. She was surprised at that. I said, "Well I put on headphones and practiced the men's steps. One of my favorite ballroom dance room teachers, Sandra Cameron, 3 times United States Ballroom Champion, told me that you can practice dancing anywhere. I must have mentioned my present professional dance partner and teacher Katerina, 2012 World Salsa Champion and 2013 World Salsa Champion among her many accolades. Of course, I told Judge Anita Torres that I enjoyed lifting weights at the camp, played basketball, enjoyed the walks around the track, bocce ball was another great activity, and the classes that were given especially on meditation and American history were wonderful. The many movies were pleasant and the food was pretty good. I added, I went to the commissary once a week to

get other things like ice cream, chocolate, salmon and basically anything you wanted. I told her it was like a vacation. It was great. Neither bars nor jail cells and I THOUGHT IT WAS OVER. It was a good ending to a horrific case of American injustice. To refresh your memory I offered not to practice my specialty of preparing income tax returns and consulting with American citizens about their tax returns for 3 years if you dropped your motion for a preliminary judgment. You came back and I asked you, "What did your supervisor say?" If my memory serves me correctly I said, "Do we have an agreement?" Then we left to go to your office to draw up my settlement. We both said goodbye to Judge Anita Torres and her legal assistant. You told me to sit down outside your office and you came out and gave me a paper and said, "All you have to do is sign." I read it and said "This is not what we agreed on." Your reply caught me really by surprise when you stated, "There was a chance you wouldn't read it." I said, "Mr. Jacob, have a nice day, I'll see you in court."

Now I think we should do our best to settle this case before trial as the Federal Rule of Civil Procedure mandates. My next letter will be to your supervisor, District Attorney Audrey Straus. Thank you and Have a Nice Day!

Yours truly,



William Doonan

Copies to:

Audrey Straus District Attorney for the Southern District of New York
Federal Judge Anita Torres
Federal Judge Katharine Parker
Federal Judge John Cronan

January 10th, 2022

William Christopher Doonan
104 Outlook Ave
Bronx NY, 10465

Audrey Strauss
United States District Attorney for the Southern District of New York
86 Chambers Street- 3rd Floor
New York, NY 10007

Re: *United States v. Doonan et al., 19 Civ. 9578*

Dear Audrey Strauss,

Please see the attached letter I sent to Charles Jacob and which I also sent to you by email today. The letter is dated January 9th, 2022 and today is January 10th, 2022. I am also sending you this through certified mail return receipt requested because I really, really, really, really, want you to read this letter and look into this case a lot more. The first thing that I would say to you is, **I think deep down you must be a very good attorney because you are a United States District Attorney.** This is a very great accomplishment for you. Perhaps it's your dream come true? It is that significant. But in this case, **Perhaps you did not give this case the attention it deserves. For instance when I discussed my cross examination of Michael Proctor with you, you more or less dismissed it as unimportant.** When I spoke to you I said to myself, "Perhaps you i.e. Audrey Struass, United States District Attorney for the Southern District of New York did not read the cross- examination of Michael Proctor as assiduously as you should have or perhaps read it, forgot about it or confused it with another case." **Therefore I am attaching a copy of the Cross examination of Michael Proctor, one of the two chief witnesses of Charles Jacob, with this letter so that you can more easily read it and hopefully it can refresh your memory and help you make a more appropriate decision.** Just to be clear, I shall describe Michael Procter to you, because I know you have many cases on your desk and perhaps you have forgotten about him.

Michael Proctor is and has been an employee of the Federal Bureau of Investigation (FBI) for over 18 years. He has 2 graduate degrees and obviously is a very intelligent person. Please read the cross examination that was conducted by William Chisopher Doonan the defendant and former attorney in this case of your chief witness who was ordered to take a deposition by Charles Jacob Assistant New York State Attorney. When you get to the part where Michael Procter states that ALL THE IRS PEOPLE ARE SCARY AND ON A MANHUNT TO GET WILLIAM DOONAN PLEASE REFLECT UPON IT. Then when you read the part of his deposition where he i.e. states **I only cooperated because I was afraid of losing my job and losing my pension. Please reflect upon this!** Hopefully you i.e. get the notion perhaps Audrey Strauss made a mistake in dismissing the enormity of these words by your chief witness, an FBI veteran of over 18 years. I have told you and Charles Jacob the exact pages where these statements are said in past communications. I could right now tell you the page numbers where those statements were made. But, I am choosing not to. The reason I am not telling you the

page numbers right now is because I really, really, really, want you to read this cross examination of Michael Proctor in a much more assiduous manner. As you read it, you will continually see that Michael Proctor asserts frequently that Mr. Doonan prepared his tax returns in a non fraudulent manner for many years. He also showed his tax return to an accountant. The accountant, as you will read stated that, "Nothing in his tax returns look fraudulent." He also states he was recommended to William Christopher Doonan by Dan Scotti. In past communications you will note that I described Dan Scotti as an FBI agent/ supervisor who was a client of mine for over 30 years. I stressed to Charles Jacob that the last time I saw Dan Scotti was on or about the first Sunday morning in February of 2013. In addition I told Charles Jacob that Dan Scotti was the 3rd highest ranking FBI agent/ supervisor in Philadelphia at that time. Obviously I requested assistance in locating Daniel Scotti because he would tell Charles Jacob the truth about William Christopher Doonan and would contribute much exculpatory evidence in favor of William Christopher Doonan. Charles Jacob told me in no uncertain terms that he would not assist me in locating Daniel Scotti. I urge you Audrey Struss, to please help me locate this gentleman. Dan Scotti has served his country in noble fashion for at least 35 years and will tell you the truth about William Christopher Doonan. I have neither seen nor heard anything from Daniel Scotti for almost 9 years. I know that Dan Scotti will tell nothing but superlatives about William Christopher Doonan, his tax attorney for over 30 years. Preparing his tax returns was always a pleasure. His questions were very perspective. The records that he kept made me proud that I taught him how to keep adequate records. He would say, "Mr. Doonan it was a pleasure recommending you to my colleagues. They always think so highly of you just like I do."

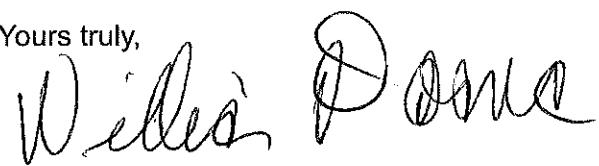
So Audrey Strauss please look yourself in the mirror and ask yourself, "Why did I go to law school? WAS IT TO HIDE EVIDENCE SO A CONVICTION BE OBTAINED WHERE IT IS NOT WARRANTED?" Audrey Strauss, Do you have a problem in locating and listening to Daniel Scotti? Charles Jacob didn't do it and believe me, if he did as I recommended this case would have ended a long time ago. I ask you again Audrey Strauss, Do you have a problem in locating Daniel Scotti and finding out the truth about his tax attorney for over 30 years? If you are unwilling or unable to contact Daniel Scotti please explain in writing what your problem is. Charles Jacob told me that he had a limited budget and that I should try to locate Daniel Scotti myself. Now you, Audrey Strauss, are you going to say the same thing. Audrey Strauss if and when the Honorable Judge Cronan asks you, "Have you been transparent in this case." What are you going to say? Are you going to be like Charles Jacob and state that you are transparent? The facts seem to indicate otherwise.

On Wednesday January 12th you will receive another letter regarding your other Chief Witness Lori Dixon, an 18 year veteran of the IRS who you and Charles Jacob are relying on to help persuade the Honorable Federal Judge Cronan to grant a permanent injunction against the defendant, William Christopher Doonan.

As previously mentioned I stressed and reiterated many times that Lori Dixon is untrustworthy, unreliable, is not following rules specifically made for auditors, and has stated many, many untrue statements, and her hearsay testimony should not be admitted under Federal Rule of Civil Procedure i.e. F.R.C.P. 803. Yet you Audrey Strauss have requested that

her hearsay testimony be admitted in this case. What will you say to the Honorable Federal Judge Cronan if he asked you, "Audrey Strauss are you trying to pull a fast one on me?" Please Audrey think about it and ask yourself, "Is this why you went to law school? When you receive my next letter dated January 12th, hopefully it will change your mind about this case. Thank you and have a nice day.

Yours truly,



William Christopher Doonan

January 12th, 2022

William Christopher Doonan
104 Outlook Ave
Bronx NY, 10465

Audrey Strauss
United States District Attorney for the Southern District of New York
86 Chambers Street- 3rd Floor
New York, NY 10007

Re: *United States v. Doonan et al., 19 Civ. 9578*

Dear Audrey Strauss:

As you can see from my letter dated yesterday I think it's wise for us to get involved with settlement negotiations. This is what the Federal Rules of Civil Procedure require. Please ask yourself a number of questions in this case before making any decisions.

1. Have you and Charles Jacob, Assistant District Attorney for the Southern District of New York negotiated in good faith? Many people when told about this case don't think Audrey Struass, United States District Attorney for the Southern District of New York and Charles Jacob, Assistant United States District Attorney for the Southern District of New York negotiated in good faith. What you have done is state that the defendant over 5 years ago pled guilty to two felonies. At present you and Charles Jacob, Assistant District Attorney for the Southern District of NY evidently think this is enough for the Honorable Judge Cronan to grant your motion for a permanent injunction. Previously, I have told Charles Jacob that he's being very presumptuous. Right now I'm telling you the exact same thing.

You are a Columbia law school graduate that means you are very intelligent! As you, undoubtedly, know the Honorable Federal Judge Rakoff, one of your supervisors has written the book called "Why the Innocent Plead Guilty and the Guilty Go Free." The evidence in this case overwhelmingly indicates that Willaim Christopher Doonan is Innocent and was forced to plead guilty.

2. The second question that I would ask you to ask yourself is, "**Why are you so afraid to have Lori Dixon cross examined by Willaim Christopher Doonan? Are you so afraid of the truth?**" Every attorney knows that we get out the truth by cross examining someone who is not telling the truth. **How many times must I tell you that Lori Dixon, one of your Chief witnesses against William Christopher Doonan, is not telling the truth.** In spite of this you have made a motion to the Honorable Federal Judge John Cronan to have her untrue hearsay testimony admitted in this case. Do you really think Judge Cronan is going to go along with your scheme to prevent the truth from being told? I doubt it! Is this why you went to Columbia Law School? I doubt it. Perhaps you are overworked, stressed out, and don't realize the enormity of injustice that you are asking a Federal Judge by the name of John Cronan to go along with. So please rethink this case and agree to the settlement that I shall offer you and Charles Jacob.

3. As previously stated William Christopher Doonan was admitted to the Bar of the United States Tax court in May 1984. He served with distinction for over 30 years in that capacity. His reputation was impeccable. His integrity was well known and his business increased enormously because he prepared honest tax returns and was continually recommended by clients like Daniel Scotti. As previously mentioned in May of 2013 was the 3rd highest ranking officer in Philadelphia. Audrey, are you aware that Willaim Christopher Doonan was thoroughly investigated from about 1/20/11 to 2/10/11 and was given a clean bill of health by 3 excellent IRS auditors?
 - a. They examined over 200 audits done over 30 years by William Christopher Doonan.
 - b. They examined at least 25 appellate decisions by the IRS. All in favor or Mr. William Christopher Doonan.
 - c. They examined 3 United States Tax Court cases that were held under the rules and regulations for small Tax Court cases, i.e. involving cases under \$150,000 where many rules of evidence are waived so that there can be quick decisions with no right of appeal.
 - d. They spoke to numerous clients and workers.
 - e. Mr. William Doonan gave them full rein to do whatever they wanted to conduct a fair and thorough investigation. They left stating superlative things about Wlliam Christopher Doonan and the way he practiced the tax law and preparation of income tax returns. They all said they learned a lot of the tax law from the tax attorney Wlliam Christopher Doonan.

As you know, approximately 27 months later, Brian Faulk, a criminal investigator for the Justice Department, initiated a new investigation of William Christopher Doonan. Brian Faulk never wanted to come to my office and see for himself what was going on! He was not interested in the prior investigation done by 3 competent IRS auditors. **He threatened innocent Americans on at least 6 occasions that I know of personally.** For instance he went to the one bedroom apartment of Demetrios Tsiampas in Astoria, Queens. He handed a subpoena to Demetrios Tsiampas and told him to give this subpoena to his son Andreas or he (Brian Faulk) and his accomplice will come and arrest him. Audrey Strauss are you starting to feel that Mr. William Doonan was treated unfairly? Mr. Demetrios Tsiampas, who can neither read English nor write English, phoned me immediately when this occurred and asked me what he should do about it. I immediately hung up. My excellent attorney, Murray Richmond had previously told me, "If anyone phones you about this case just hang up. If you don't hang up, the Justice Department will probably charge you with Obstruction of Justice." Demetrios Tsiampas, a Greek immigrant who worked really hard to get ahead in America, had to pay an attorney a significant amount of money in order to represent him. It is my understanding they went to the office of Brian Faulk. The attorney of this poor immigrant Greek American excoriated Brian Faulk. I assure you when this trial occurs I will do the same.

In case you don't know Audrey, a number of times I asked Charles Jacob to help me find Brian Faulk so that I could crossexamine him myself. As you know from my previous letters he refused to help me locate anybody, especially people like Brian Faulk, Dan Scotti and Martin

Ball. If I was able to locate these people this case would not be on your desk today. I think it would be appropriate not to chastise Charles Jacob too much. Perhaps he is overworked and did not give this case the attention it deserves. Please mention to Charles Jacob and your supervisor that no human institution is perfect. I am sure you know of a number of innocent Americans who have been executed due to mistaken efforts of the Justice Department. Indeed look at the recent actions of a number of governors, particularly the governor of Illinois. As you probably know, he has halted all executions in his state because of the numerous errors which resulted in capital punishment for many innocent people. Many mistakes are made in an institution as large as the United States Justice Department. In my case the Justice Department did not live up to its reputation and its employees made mistakes in judgment which resulted in my being forced to plead guilty for two felonies (See United States District Court Judge Rakoff's great book titled, "Why the Innocent Plead Guilty and the Guilty go Free"). This very high ranking Federal Judge shows unequivocally that innocent people like me are forced to plead guilty by the United States Justice Department quite often.

Audrey, one of my favorite books which I read at least once every year is titled, "How to Win Friends and Influence People" by the great Dale Carnegie. I can still remember Professor Hart, one of my professors at Fordham University in 1962. He stated, "This might be the most important book you will ever read in your entire college career and will influence you for the rest of your life." One chapter is titled, "When you make a mistake, admit it." Audrey, I think you are making a mistake in supporting the Draconian penalty that Charles Jacob wants in this case. Be aware Audrey that much exculpatory evidence in this case, has been ignored. I am sure you are unaware of this fact. I am in the process of making you aware of this so that you will agree with me when I recommend to you what I think is a fair and just settlement of this case. I am hoping and deep down believe that a very smart Columbia law school graduate like yourself will come to the conclusion that this case should be settled in Mr. William Doonan's favor because the facts in this case indicate that an innocent, excellent attorney has been unjustly persecuted and bothered by the United States Justice Department and that Audrey Strauss will step in and put an end to this persecution. Tomorrow you shall receive another letter which I am sure will help you decide what to do in this case. Think ECAB! Think 1970's Bronx Criminal Court! In tomorrow's letter I shall explain.

Thank you
Have a nice day.

Yours truly,

William Christopher Doonan

Copies to:
Federal Judge Anita Torres
Federal Judge Katharine Parker
Federal Judge John Cronan
Charles Jacob Assistant District Attorney for the Southern District of New York

January 13th, 2022

William Christopher Doonan
104 Outlook Ave
Bronx NY, 10465

Audrey Strauss
United States District Attorney for the Southern District of New York
86 Chambers Street- 3rd Floor
New York, NY 10007

Re: *United States v. Doonan et al., 19 Civ. 9578*

Dear Audrey:

As previously stated I am trying to apprise you about this case because I have a feeling that you know very little about it. Are you aware that Charles Jacob, on one or more occasions told me it would not be wise for me to contact you? He even put that in writing. In other words he wants to give you his side of the story. Unfortunately Chalres Jacob I think has left out many, many important things about this case.

Just about all the evidence in the criminal case against William Christipoher Doonan was tainted. There is no question in my mind that the IRS criminal investigator, Brian Faulk, was out to get William Christopher Doonan. When Brian Faulk initiated his new investigation on or about May 13th, 2013, I was very surprised because just 2 years earlier I was given a clean bill of health by 3 excellent IRS auditors. Charles Jacob initiated his investigation of me by not looking at the facts. His idea, I'm sure you'll agree, was to make up facts that he would use to get me. I received hundreds of phone calls from former clients, at the time they were my clients. They told me that Brian Faulk and one of his accomplices came to their house uninvited without an appointment and immediately said, "We are not here to get you, we are here to get William Christopher Doonan. I understand he prepared your tax returns. Can I come in to talk to you?" Needless to say, many many people told the truth about William Christopher Doonan and told Brian Faulk and his accomplices to leave immediately. Not even one of the thousands of clients of William Christopher Doonan succumbed to the pressure that Brian Faulk and his accomplices applied. Many of my former clients told him, "Get the (expletive deleted) out of there!"

After over 3 years of doing this type of investigation Brian Faulk came up with nothing detrimental to William Christopher Doonan. So, he started questioning people that worked for me. Then he started to ask questions about William Christopher Doonan to people that had not worked for me for over 10 years. Again Brian Faulk came up with nothing detrimental to William Christopher Doonan. When I finally met Brian Faulk and one of his accomplices when I was being fingerprinted, he stated, "Mr. Doonan I told you about 3 years ago when I started this investigation that I always get my man." I said, "Mr. Faulk, I remember that vividly. That's why I hired Murray Richmond, an excellent attorney because I needed protection from you" I added, "You sure did a number of illegal things in order to get me." Brian Faulk stated in front of his accomplice, "We did what we had to do." I said, "I can really use a cup of coffee now." He said, "That's against the rules." His accomplice said, "We are not allowed to let you out of our sight

while you are waiting to get fingerprinted." I said, "Come on guys, you've broken a number of laws in order to get me here. Can you please get me a cup of coffee? I'm not going to run away. I'll be here when you come back." Then Brian Faulk's accomplice said, "We do have a lot of paperwork in the office, he's not going anywhere." Mr. Faulk said, "Good idea." They came back about an hour later with a really nice cup of coffee for me. I was fingerprinted and left. So you can see, Audrey, from this conversation that Brian Faulk was not shy at all about his illegal methods to get people to tell him whatever he wanted to hear and of course what he wanted to hear was not the truth about William Doonan. In tomorrow's letter I will be more expansive in describing the illegal methods that Brian Faulk used to terrorize at least 5 people in order for him to get William Doonan. I am sure you are interested and becoming more interested in this case that your assistant Charles Jacob has been working on for over three and a half years. As you know Charles Jacob initiated this case on or about August 15th, 2018. I told all of this to Charles Jacob. He did not listen to me. Now this case is on your desk and hopefully you will listen to me and do the right thing.

Thank you

Have a nice day

Yours truly,

William Christopher Doonan

Copies to:

Federal Judge Anita Torres
Federal Judge Katharine Parker
Federal Judge John Cronan
Charles Jacob Assistant district Attorney for the Southern District of New York

January 16th, 2022

William Christopher Doonan
104 Outlook Ave
Bronx NY, 10465

Audrey Strauss
United States District Attorney for the Southern District of New York
86 Chambers Street- 3rd Floor
New York, NY 10007

Re: *United States v. Doonan et al., 19 Civ. 9578*

Dear Audrey Strauss:

Dear Audrey In my letter dated January 12th, 2022 (See attached letter), I ended the letter with, "Think ECAB! Think 1970's Bronx Criminal Court." ECAB is an acronym for **Early Case Assessment Bureau**.

Many cases in the Bronx Criminal Court in those days, were at a very high level of jurisprudence. Many cases reached high levels of jurisprudence which should never have reached the heights they were at. In other words they should have never been brought in the first place or settled somewhere along the line. So, to resolve the problem, excellent, veteran Assistant District Attorneys, like my twin brother, Kenneth Doonan, were assigned to arraignment to properly dispose of cases immediately and not go through the system wasting everyone's time. Audrey Strauss my case has reached an extremely high level. It is on your desk right now. In approximately one month the preliminary injunction, which was granted to your office will expire. **In granting a preliminary injunction, you know as well as I, that you are supposed to come up with additional evidence to warrant a permanent injunction.** This has not been done! Not even close! The evidence in this case indicates that what you developed was totally exculpatory. So, tell me, why in this world would a Federal Judge grant a permanent injunction to you. **You graduated from Columbia Law School.** I am sure they taught you about summary judgment! As you well know, summary judgment is granted very rarely. This judicial remedy is reserved only when there is no dispute regarding the facts. **You are a Columbia Law School graduate.** Please look at yourself in the mirror and say to yourself, "How did I get here? I am supporting a motion for summary judgment when many, many facts are in dispute. The defendant in this case i.e. William Christopher Doonan, an excellent tax attorney for over 30 year is accusing me of using a witness that is i.e. Lori Dixon who is not telling the truth. On top of that, I, Audrey Strauss, a Coloumbia law school graduate, a United States District Attorney for the Southern District of New York has been told Lori Dixon is a **scary person**. Who with other IRS personnel was on a manhunt to get William Christopher Doonan by Michael Proctor, a government witness deposed by Charles Jacob and cross examined by William Christopher Doonan." As you know, after reading the cross examination of Michael Proctor by William Doonan it elicited the truth from Michael Proctor, an 18 year veteran of the FBI, at one time your chief witness against William Christopher Doonan. Michael Proctor stated that he only cooperated with the government because he was afraid of losing his job and his pension. **Under cross examination we developed the truth!**

Now, guess what? You, Audrey Strauss, a Columbia Law School graduate, are asking a Federal Judge by the name of Judge John Cronan to not allow William Christopher Doonan to cross examine Lori Dixon, your only remaining witness. A fair question by William Christopher Doonan to Lori Dixon would be, "Lori Dixon, are you cooperating with the government because you are afraid of losing your job and your pension?"

Audrey Struass, please ask yourself, "How in the world can I, a Columbia Law School Graduate, support such a motion?" Audrey Strauss, please ask yourself, "Is my only job to get convictions no matter what?" "Is getting a conviction in this case so important to me that I want to muffle Lori Dixon?" "Am I really asking a Federal Judge to suppress the truth so that I can get a conviction?" "Is this what I dreamt of when I dreamt of being an Attorney?" Audrey Strauss please ask yourself, "Am I living up to my ethics and ideals?" Audrey Strauss, please ask yourself, " Am I proud of this case?" Audrey imagine telling your husband or your child, "Hey, guess what I did at work today? Charles Jacob and I prepared a motion to the Honorable Federal Judge Judge Cronan to not allow William Christopher Doonan to ask questions of our only remaining witness against him. Isn't that great!" What would you say to your husband or your child when they ask, "Audrey didn't your last witness Michael Proctor, a FBI agent for 18 years say under oath during his cross examination by William Christopher Doonan. In addition, didn't Michael Proctor say that all you IRS people are scary and on a manhunt to get William Christopher Doonan and that **he only cooperated with you because he was afraid of losing his job and pension.**" Audrey imagine your child saying to you, "Mommy do you think you are doing what's right? It seems wrong to me. Are you afraid of the truth?" Think about it, Audrey. Please think about it.

Audrey in this case I urge you to be a leader not a follower. Right now you are supporting and following in my estimation, Charles Jacob. Judge Rakoff in his excellent book, "**Why Innocent People Plead Guilty and The Guilty Go Free**" highlights the fact that many supervisors automatically support the attorneys that work for them without thinking about it too much. Please remember nobody's perfect and Charles Jacob in this case has made a number of mistakes and as far as I am concerned, a person of your caliber can tell Charles, "Normally you do a good job but in this case but I am going to overrule you, withdraw our motions and make a new motion. Indeed, I am going to ask the Honorable Federal Judge Cronan to drop this case and I, Audrey Strauss, will take it upon myself to write a letter to the New York Bar Association and the United States Tax Court because I, Audrey Strauss, a United States District Attorney will do this because I'm convinced William Christopher Doonan was persecuted unfairly.

Thank you

Have a nice day.

Yours truly,



William Christopher Doonan

Copies to:

Federal Judge Anita Torres
Federal Judge Katharine Parker
Federal Judge John Cronan
Charles Jacob Assistant District Attorney for the Southern District of New York

January 17th, 2022

William Christopher Doonan
104 Outlook Ave
Bronx NY, 10465

Audrey Strauss
United States District Attorney for the Southern District of New York
86 Chambers Street- 3rd Floor
New York, NY 10007

Re: *United States v. Doonan et al., 19 Civ. 9578*

Dear Audrey Strauss:

By now you have read about a lot of things you didn't know about before regarding this case. I sure hope you have read the great book by Jed. S. Rakoff "Why The Innocent Plead Guilty and the Guilty Go Free and Other Paradoxes of our Broken Legal System." Please read page 27 and 28. Where it states, "The answer may be found in Jefferson's insight that a criminal justice system that is secret and government- dictated ultimately invites abuse and even tyranny." Judge Jed. S. Rakoff, A senior judge of the United States District Court for the Southern District of New York states, "First it is grossly one- sided and inconsistent with our constitutional and instructional notions of fair play. Second, the current plea- bargaining system is largely secret and unreviewable, in ways that invite inconsistency at best and oppression at worst. Plea bargains are mostly the product of secret negotiations behind closed doors in the prosecutor's office, and are subject to almost no review, either internally or by the courts. Such a secretive system inevitably invites arbitrary results. Third, and possibly the gravest objection of all, the prosecutor- dictated plea- bargain system, by creating such inordinate pressures to enter into plea bargains, appears to have led a significant number of defendants to plead guilty to crimes they never actually committed."

Audrey Struass this is my situation. I was unfairly prosecuted. The evidence that I have presented to you is overwhelmingly in my favor.

As you, undoubtedly, know Jed. S. Raffoff is "A senior judge of the United States District Court for the Southern District of New York and an adjunct professor at both Columbia University Law School and New York University Law School. Since going on the bench in 1996, Rakoff has authored more than 1,800 judicial opinions. He has served as a commissioner for the National Commission on Forensic Science and as co- chair of the National Academy of Science' committee on eyewitness identification. He has also assisted the U.S Department of Commerce and State in training judges in a dozen countries. Rakoff is a regular contributor to *The New York Review of Books*. In 2014, he was listed by *fortune* magazine as one of the world's 50 Greatest Leaders. Grounded in Rakoff's twenty- four years as a federal trial judge in New York in addition to the many years he worked as a federal prosecutor and criminal defense lawyer, Rakoff's assessment of our justice system illuminates some of our most urgent legal, social, and political issues: plea deals and class- action lawsuits, corporate impunity and death penalty, the perils of eyewitness testimony and forensic science, the war on terror and the expandind reach of the executive branch. A fundamental problem, he reveals, is that the judiciary is constraining its own constitutional powers."

So, Audrey Strauss, I have never met you. I know you are a very intelligent woman. That's wonderful. If my arguments still do not persuade you, can you please put in writing what you don't agree with? I shall phone your office Wednesday, the 26th of

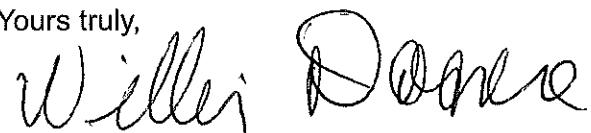
January at approximately 10:15 am. Hopefully you will be prepared to initiate settlement negotiations.

To sum up, William Christopher Doonan was an excellent tax attorney for over 30 years. He had an excellent reputation. He prepared honest, non fraudulent tax returns for thousands of people. Your office has not even come up with one client of William Doonan's stating anything derogatory about him. Your chief FBI witness who Charles Jacob deposed stated that, "All you IRS people are scary and on a manhunt to get Mr. Doonan, " This is plain English coming out of the mouth of an 18 year veteran of the FBI that your office deposed as a witness for the prosecution. Can anything be more damning to your case? Well Michael Proctor, shortly after making this statement stated, "I only cooperated because I was afraid of losing my job and my pension." Your last remaining witness, Lori Dixon, your chief investigator in this civil case against William Christopher Doonan you did not depose. William Christopher Doonan has stated numerous times that the hearsay that you want the Honorable Federal Judge Cronan to hear from Lori Dixon is full of untrue statements. So let's meet and see if we can settle this case in a fair and just manner.

Thank you

Have a nice day.

Yours truly,



William Christopher Doonan

Copies to:

Federal Judge Anita Torres
Federal Judge Katharine Parker
Federal Judge John Cronan
Charles Jacob Assistant District Attorney for the Southern District of New York